

JAP:HDM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- x
UNITED STATES OF AMERICA

- against -

JOCELYNE LAKE,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MARK COZINE, being duly sworn, deposes and states that he is a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

On or about July 23, 2015, within the Eastern District of New York and elsewhere, the defendant JOCELYNE LAKE did knowingly, intentionally and unlawfully import into the United States from a place outside thereof, cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960)

15 M 692

PRE-ARRAIGNMENT
COMPLAINT
(21 U.S.C. §§ 952(a)
and 960)

*Fed Def
M Schmeider
7/24/15
3:40 PM*

The source of your deponent's information and the grounds for his belief are as follows:¹

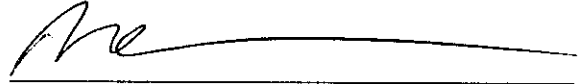
1. On July 23, 2015, the defendant JOCELYNE LAKE, a citizen of the Netherlands, arrived at John F. Kennedy International Airport ("JFK") in Queens, New York aboard Jet Blue Flight Number 310 from Santo Domingo, Dominican Republic.

2. A Customs and Border Protection ("CBP") officer stopped the defendant for a border enforcement examination. An interview was conducted. During the interview, the defendant stated that she had inserted foreign objects in her vaginal and anal cavities. The defendant then voluntarily removed her vaginal insert. The object was probed and revealed the presence of a white powdery substance, which field-tested positive for cocaine. The total gross weight of the vaginal insert was 344.9 grams of cocaine. The defendant read a standard x-ray consent form, which she signed. After which, the defendant was then transported to the medical facility at JFK, and subjected to an x-ray. The x-ray showed the presence of foreign bodies inside the defendant's intestinal tract.

3. The defendant will be detained at the JFK medical facility until such time as she has passed all the pellets contained within her intestinal tract.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully request that the defendant be dealt with according to law.



MARK COZINE
Special Agent
Homeland Security Investigations

Sworn to me before this
24th day of July, 2015


THE HONORABLE STEVEN M. GOLD
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK